

FCC MAIL ROOM

NOV 23 1998

RECEIVED

Sheet 1 of 2

FCC Secretary, Magalie Roman Salas
Office of the Secretary, Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

In the Matter of 1998 Biennial Regulatory Review---Amendment of Part 97 of the Commission's Amateur Service Rules, FCC WT Docket No. 98-143 including RM-9148, RM-9150 and RM-9196.

Weston D. Clement, N1WC
RFD #2, Box 67A
Harpwell, ME. 04079

I file these comments on 18 Nov., 1998, in response to the FCC's review of Amateur Service Rules, WT Docket No. 98-143.

A. Number of License Classes

The proposal to phase out the Novice Class license and grandfather current holders of a Novice Class operator license appears as a reasonable approach to reduce the burden on the Commission. However, as a VE, I do not find administering the examinations associated with the current six classes of operator licenses to be excessive. The low number of Novice Class applications (961) in 1997 compared to receipt of a large number of no-code Technician Class operator license requests (21,416) may not be an indication of interest in the Novice Class license. This disparity may be the lack of perseverance by individuals to master the 5 WPM Morse code requirement. If this proposal is adopted, band restrictions currently in place for holders of Novice Class operator licenses should be retained. This restriction provides the impetus for individuals to apply the effort to obtain a higher class license and the accompanying increase in band privileges.

B. Greater Volunteer Examiner Opportunities

ARRL proposal per RM-9148 permitting VEs holding Advanced Class licenses to administer examinations for a General Class operator license is logical. In addition, the FCC proposal to permit General Class operator licensees to administer examinations for Technician Class licenses also appears reasonable. However, in all cases examiners (VEs) should be permitted to administer only elements which they themselves have successfully passed.

C. RACES Station License

The RACES station license should be discontinued as proposed. Current rules allow any amateur radio station to engage in RACES communications provided said station has been properly registered with a civil defense organization.

D. Privatization of Certain Enforcement Procedures

Violations to provisions of the Communications Act relating to amateur radio and/or persons who have violated rules that govern the Amateur Radio Service abound. Enforcement of these rules is virtually non-existent at this time. Therefore changes in the rule enforcement process is vitally needed. Whether enforcement is turned over to the Amateur Auxiliary per RM-9150 or to another organization of volunteers having the proper credentials should be considered. Changes must be implemented to improve the quantity and quality of enforcement of amateur rules including a crack down on malicious radio interference. Privatization would undoubtedly be in the

No. of Copies rec'd
List ABCDE

0+9

FCC MAIL ROOM

JUN 23 1998

RECEIVED

Sheet 2 of 2
Comments on
WT Docket No. 98-143
Weston D. Clement

best interest of the Commission and the Amateur Radio Service.

E. Telegraphy Examination Requirements

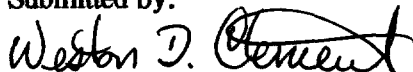
Morse code standards as currently imposed are relevant in the field of amateur radio. History shows that when the complex communication systems of today fail and emergency conditions exist, the Amateur Radio Service has filled the need for local and long-haul communications. In disaster situations when propagation conditions are poor and heavy interference is present radiotelegraphy is superior to voice modes. This is extremely evident when language barriers exist. The only way to maintain a competent pool of Morse code operators is to retain the requirements now imposed. The effort to eliminate and/or reduce the code requirements is not because VEs are burdened with the testing process but because today's society condones the idea of "get the most for the least amount of work". A U.S. Amateur Radio license is a privilege and an effort should be required to obtain said privilege. The concept of dumbing down amateur radio should be nixed via the FCC licensing requirements. Any relaxation in code requirements, opposed by the undersigned, should require proficiency examinations to specify perfect copy of one minute out of five minutes sent in lieu of fill-in-the-blank or multiple choice answers. The idea to expand the written portion of examinations means little as exact questions/answers are available in various publications and are often memorized. As a VE, I have observed from test scores that many individuals sitting for a U.S. Amateur license have not studied or practiced code copy but merely hope for a correct guess at the multiple choice answer. The emphasis on personal achievement to obtain a U.S. Amateur Radio license will be virtually eliminated by a relaxation in the present Morse code requirements.

Comments on the ARRL requests per RM-9196 are as follows. Based upon certification by a licensed physician an examinee should not be required to attempt the higher speed telegraphy examination. However, VECs should be authorized to request basic medical information from the certifying doctor pertaining to the examinee's disability only as applicable to the code examination.

F. Written Examinations

The general topics specified in each license class examination are currently sufficient provided the question and answer data base is updated on a regular basis and approved by the National Conference of VECs. Preparation and administration of written examinations under the VE system as presently configured has met objectives in a timely fashion and does not require modifications. I believe the current rules and examination process adequately cover information relevant in determining an applicant's operational and technical qualifications to hold a U.S. Amateur license. Although computers and various data subsystems are often interfaced with amateur radio equipment, a detailed knowledge of digital techniques is not, and should not, be a prerequisite to operate a basic amateur radio station.

Submitted by:



Weston D. Clement
RFD #2, Box 67A
Harpwell, ME. 04079